

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	CRIMINAL NUMBER C-17-735
	§	
	§	
JAMES RANDALL LEE ROSS, ET AL	§	

PROTECTIVE ORDER REGARDING DISCOVERY

Upon consideration of the Government's Motion for Protective Order Regarding Discovery, it is hereby

ORDERED, ADJUDGED AND DECREED that (when the term "Defendant" is used, said term encompasses an attorney for the Defendant):

- A. Discovery materials and all copies thereof should be protected from unnecessary dissemination.
- B. Such discovery materials provided by the United States should be utilized by the Defendant solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding.
- C. Such discovery materials and their contents, and any notes or other record of such materials or their contents, should not be disclosed either directly or indirectly to any person or entity other than the Defendant, Defendant's counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure.
- D. Such discovery materials should not be copied or reproduced except as necessary to provide copies of the material for use by an authorized person as described above to

prepare or assist in the defense, and all such copies and reproductions will be treated in the same manner as the original matter.

E. Defendant's counsel should not provide copies of these discovery documents to the Defendant nor any other person (not including defense counsel's staff or persons hired to assist defense counsel such as accountants, interpreters, investigators) except where found by the court in writing to be absolutely necessary to prepare or assist in the defense. Defense counsel shall provide such persons hired to assist him with copies of this Court's protective order and explain its restrictions regarding same.

F. Defendant's counsel should inform the Defendant of the provisions of the Protective Order, and direct him not to disclose or use any information contained in the government's discovery in violation of the Protective Order.

G. All discovery and all copies of same (excluding any recordings, documents or material belonging to Defendant i.e. recordings containing her voice, her bank records, documents containing her signature) shall be returned to the United States Attorney's Office following disposition of the case, except where an appeal is anticipated.

H. However, nothing contained in the Protective Order will preclude any party from applying to the Court for further relief or for modification of any provision hereof.

Signed in Corpus Christi, Texas, on this the ____ day of December, 2017.

Honorable NELVA GONZALES RAMOS
UNITED STATES DISTRICT JUDGE